

1 THE HONORABLE DAVID G. ESTUDILLO
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 TOMMY BROWN, on his own behalf and
11 on behalf of other similarly situated
12 persons,

13 Plaintiff,

14 v.

15 TRANSWORLD SYSTEMS, INC., *et al.*,

16 Defendants.

No. 2:20-cv-00680-DGE

17 STIPULATION AND [PROPOSED]
18 ORDER TO EXTEND BRIEFING
19 DEADLINES

20 NOTE ON MOTION CALENDAR:

21 May 31, 2022

22 **STIPULATION**

23 Pursuant to Western District of Washington Local Civil Rules 7(d)(1) and 10(g), Plaintiff
24 Tommy Brown (“Plaintiff”) and Defendants Transworld Systems Inc. (“TSI”), Patenaude &
25 Felix, APC (“P&F”), U.S. Bank National Association (“U.S. Bank”), National Collegiate
26 Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate
Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate
Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate
Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National
Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F,
and U.S. Bank, “Defendants”) stipulate that Plaintiff’s deadline to file oppositions to the
Defendants’ Motions to Dismiss the Amended Complaint (Dkts. No. 105-108) in the above-

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1 referenced action is extended from May 31, 2022 to June 14, 2022. Likewise, the Defendants'
 2 deadline to file a Reply in Support of their Motions to Dismiss is extended from June 14, 2022 to
 3 July 19, 2021.

4 1. The Parties set their current briefing deadlines related to the Motions to Dismiss
 5 the Amended Complaint in response to stipulation and order filed in response to the Court's
 6 February 14, 2022 directive to file a status report after (Dkt. Nos. 102, 103). No prior joint
 7 requests to extend the above deadlines have been made. In addition, the Plaintiff has represented
 8 by his counsel that they require additional time to analyze the issues presented in the pending
 9 Motions to Dismiss the Amended Complaint.

10 2. The parties have entered into this stipulation and agreement to mutually cooperate
 11 in the management of this action. Accordingly, the parties hereby stipulate and agree that the
 12 deadlines set forth in the Order dated March 8, 2021 (Dkt. No. 103) should be modified as
 13 follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Deadline for Plaintiff to file Oppositions to Defendants' Motions to Dismiss the Amended Complaint	May 31, 2022	June 14, 2022
Deadline for Defendants to file Reply in Support of their Motions to Dismiss the Amended Complaint	June 14, 2022	July 19, 2022

24 The extension of the above deadlines does not alter or modify any other rights or
 25 responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules
 26 of Civil Procedure, or the Local Civil Rules.

1 DATED: May 31, 2022.

2 HENRY & DEGRAAFF, P.S.

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8 Association, National Collegiate Student Loan
Trust 2004-1, National Collegiate Student
9 Loan Trust 2004-2, National Collegiate
Student Loan Trust 2005-1, National
10 Collegiate Student Loan Trust 2005-2,
National Collegiate Student Loan Trust 2005-
11 3, National Collegiate Student Loan Trust
2006-1, National Collegiate Student Loan
12 Trust 2006-2, National Collegiate Student
Loan Trust 2007-1, National Collegiate
Student Loan Trust 2007-2*

13 LEE SMART, P.S., INC.

14 By: /s/ Marc Rosenberg

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STIPULATION AND [PROPOSED] ORDER
TO EXTEND BRIEFING DEADLINES
(No. 2:20-cv-00680-DGE) -4

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[PROPOSED] ORDER

IT IS SO ORDERED. The amended deadlines are as follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Deadline for Plaintiff to file Oppositions to Defendants' Amended Motions to Dismiss	May 31, 2022	June 14, 2022
Deadline for Defendants to file Reply in Support of their Motions to Dismiss	June 14, 2022	July 19, 2022

The extension of the above deadlines does not alter or modify any other rights or responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules of Civil Procedure, the Local Civil Rules, or the Court's Chamber's Procedures.

DATED this _____ day of May, 2022.

Honorable David G. Estudillo